IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| MARK L. BUNCE, | : | |
|------------------------------------|---|------------------------|
| 71 : 100 | : | |
| Plaintiff, | • | |
| VS. | : | |
| VISUAL TECHNOLOGY | : | Civil Action Case No. |
| INNOVATIONS, INC. | : | C.A. No. 2:23-cv 01740 |
| and | : | |
| MATHU G. RAJAN, | : | |
| | : | |
| Defendants/Counterclaim and Third- | : | |
| Party Plaintiffs | : | |
| VS. | : | |
| Mark Bunce, | : | |
| Counterclaim Defendant | : | |
| and | : | |
| Timothy McCarthy | : | |
| Third -Party Defendant | : | |

NOTICE OF BANKRUPTCY FILING AND REQUEST FOR AUTOMATIC STAY

Defendants' Bankruptcy Filings and Request for Stay

Dear Clerk of Court:

Please take notice that on January 6, 2025, the defendants, filed a petition for relief under the United States Bankruptcy Code in the United States Bankruptcy Courts. Defendant Mathu Rajan had to refile the January 6, 2025 filing with a new filing on January 28, 2025. The new filing is also in the Bankruptcy Court in Eastern District of Pennsylvania which has assigned a new case number of 25-10356. The old filing number was 25-10042. The automatic stay remains in effect.

As a result of the filings, the defendants are entitled to an automatic stay of all judicial proceedings, including those currently pending in this Court, as provided under 11 U.S.C. § 362(a). We respectfully request that the Court take notice of the automatic stay and take the necessary steps to stay the proceedings in the above-referenced case, pending further order of the Bankruptcy Court or resolution of the bankruptcy matters.

We respectfully request that the Court enter an order acknowledging the automatic stay and continuing any pending hearings or proceedings until further notice from the Bankruptcy Court.

If any further information or documentation is required, please do not hesitate to contact us.

Thank you for your attention to this matter.

Dated: January 28, 2024 Respectfully submitted,

/s/ Raja Rajan Raja Rajan, Esquire, Attorney I.D. 58849 2009 Chestnut Street Philadelphia, PA 19103 215-550-1002 raja@rajanlawgroup.com